

completed and responses to written discovery served	
Expert Discovery (if needed) <ul style="list-style-type: none"> a. Plaintiffs' expert disclosure deadline b. Defendant's expert disclosure deadline c. Depositions of all experts, if any. 	<ul style="list-style-type: none"> a. August 2, 2021 b. September 2, 2021 c. November 1, 2021
Filing of dispositive motions	January 31, 2022
Final Pretrial Conference	To be determined

Electronic Discovery

Pursuant to Rule 16 and 26(f), the parties will confer following service of each party's document requests to determine whether particular electronic discovery processes should be implemented.

Discovery Limitations

The parties are obligated to limit discovery as set forth in Fed. R. Civ. P. 26(b).

Trial by Magistrate

The Parties do not consent to a trial by a magistrate judge.

Settlement Proposals

Prior to filing this case, counsel for the Plaintiffs presented a written settlement demand to Defendants, and Defendants responded to same. Counsel continue to confer with their respective clients regarding the same.

Local Rule 16.1(D)(3) Certifications

The parties will file their certifications pursuant to Local Rule 16.1(D)(3) separately.

Joint Pre-Trial Memorandum and Trial Readiness

The parties will submit a Joint Pre-Trial Memorandum and be ready for a Pre-Trial Conference in this action within 60 days after the date of a final ruling by the Court on all dispositive motions, or within 60 days after the due date for dispositive motions, if no such motions are filed.

Assent to Scheduling on Written Submission

Per the Court's order of January 15, 2021, the Parties do not object to the court setting the schedule on the written submission.

Respectfully submitted,

Plaintiffs,

Defendants,

By their attorney,

By their attorney,

/s/ Michael J. Bace

Michael J. Bace (BBO: 669948)

Email: mjb@bacelaw.com

BACE LAW GROUP, LLC

PO Box 9316

Boston MA 02114

508-922-8328

F. 866-700-0181

Dated: January 27, 2021

/s/ Brian J. Bouchard

Mark Ventola, Esq. (BBO# 549570)

Brian J. Bouchard, Esq. (BBO# 687675)

SHEEHAN PHINNEY BASS & GREEN PA

28 State Street, 22nd Floor

Boston, MA 02109

(617) 897-5630

(603) 627-8118

mventola@sheehan.com

bbouchard@sheehan.com

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2021, a copy of the foregoing document was filed electronically through the Court's ECF system.

/s/ Brian J. Bouchard, Esq.

Brian J. Bouchard